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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

ANTONIA IVANOVA, an Individual,

Case No.: 3:24-cv-01254-AB

Plaintiff,

v.

OREGON HEALTH AND SCIENCE
UNIVERSITY, an independent public
corporation,

**DECLARATION OF SOPHIE SHADDY-
FARNSWORTH IN SUPPORT OF
DEFENDANT'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE
REPLY IN SUPPORT OF MOTION TO
STRIKE AND/OR PARTIAL MOTION
TO DISMISS**

Defendant.

I, Sophie Shaddy-Farnsworth, do hereby declare and say:

1. I am an attorney licensed to practice law in the state of Oregon and am one of the attorneys representing Defendant Oregon Health and Science University (“OHSU”) in the above-captioned litigation. I make this declaration based on my own personal knowledge.

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REPLY IN SUPPORT OF MOTION TO STRIKE AND/OR PARTIAL MOTION TO
DISMISS

2. OHSU's deadline to file its Reply in support of its Motion to Strike Allegations From Plaintiff's First Amended Complaint and/or Partial Motion to Dismiss (dkt. 17) is currently set for December 18, 2024. OHSU moves for an extension of time of 9 days, until and including December 27, 2024, in which to file its Reply.

3. In addition to briefing this matter, counsel for OHSU have significant commitments in other cases pending in this District, including multiple day-long depositions this week in *Khimich v. OHSU*, Case No. 3:23-cv-01239-YY and *Jiminez Mendez et al.*, Case No. 3:23-cv-01190-IM, and responsive pleadings and motions deadlines in several other vaccine-related lawsuits before the end of this week (including briefing deadlines in *Matthews v. Legacy Health*, Case No. 6:24-cv-00592-MC; *Coates et al. v. Legacy Health*, Case No. 3:23-cv-00931-JR; and *Lucas v. Legacy Health et al.*, Case No. 3:24-cv-00150-SI.). Additionally, OHSU attorney Brenda K. Baumgart is scheduled to be in all-day meetings several days this week.

4. I conferred with Plaintiff's counsel regarding OHSU's motion and plaintiff does not object to the requested extension.

5. This is OHSU's first request for an extension of time to file its Reply and the motion is being made in good faith and not for the purposes of delay. Plaintiff does not object to the extension. This motion is being made in good faith and not for the purposes of delay.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: December 17, 2024.

/s/ Sophie Shaddy-Farnsworth
 SOPHIE SHADDY-FARNSWORTH, OSB No. 205180
 Attorney for Defendant OHSU